

STATE OF NORTH DAKOTA )  
 ) SS  
COUNTY OF CASS )

I, Geoffrey Bakken, being duly sworn, depose and state as follows:

1. I have worked as a Deputy for the Clay County Sheriff's Office in Moorhead, MN since 2013, and am a licensed Peace Officer in the State of Minnesota. I have been a Detective assigned to the Narcotics division since February of 2019. I was assigned to work as a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA) in Fargo, ND from February 2019 to October of 2021. I have been assigned as Postal Inspector Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS) since May 2022 and have completed a 24-hour USPIS orientation course. I am currently assigned to a narcotics assignment, located at the Fargo, ND office of the Denver Division. As part of my duties as a U.S. Postal Inspector TFO, I investigate the use of the U.S. Mails to illegally send and receive controlled substances and drug trafficking instrumentalities. As part of this assignment, I received formal training from the USPIS and training through contact with experts from various law enforcement agencies. I have received training in the enforcement of laws, and the identification of packages with characteristics indicative of criminal activity. I have conducted and participated in criminal investigations utilizing the normal methods of investigation.
2. Since the affidavit is being submitted for the limited purpose of supporting a package search warrant, I have not included each and every fact known concerning this investigation. I have set forth only the facts believed necessary to establish probable cause to search said packages. Where statements of others are set forth in this affidavit, they are set forth in substance and are not verbatim. The information contained in this affidavit is based on my personal observations and experience, in addition to information obtained by other law enforcement agents, witnesses and documents.
3. On February 12, 2025, during a routine review of USPS packages destined to North Dakota, USPIS personnel identified a suspicious Priority Mail Express package enroute

from Las Vegas to Fargo, ND. On February 12, 2025, the package was placed into the mail stream from Las Vegas, NV 89119. The package displays tracking number EJ 957 129 389 US, weighs 12 pounds, and has \$132.40 in US Postage affixed. The Package was paid for with cash and had an original scheduled delivery date of February 13, 2025. The package is from “Mya Jones 1525 E. Tillman Falls ave. Las Vegas, NV 89183” and addressed to “Adam Hallberg 4450 30<sup>th</sup> ave. S #211 Fargo, ND 58104”.

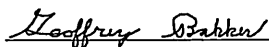
4. On February 13<sup>th</sup>, 2025, USPIS TFO Justin Phillips applied for and received a federal search warrant (3:25-mj-113), authorized by the Honorable U.S. Magistrate Judge Alice Senechal in the District of North Dakota to search the above-mentioned suspicious Priority Mail Express package destined to Fargo, ND following a positive K-9 alert to the presence of the odor of controlled substances.
5. On February 13<sup>th</sup>, 2025, the search warrant was executed on the suspicious Priority Mail Express package. The Priority Mail Express package was found to contain plain white t-shirts and four individual gallon size zip seal bags containing a white crystalline substance. The white crystalline substance field tested positive for methamphetamine, utilizing the Thermoscientific Trunarc, and had a gross approximate weight of 4,524 grams. Your Affiant is aware that methamphetamine is a scheduled controlled substance.
6. On February 14<sup>th</sup>, 2025, USPIS personnel identified a second suspicious package sent from Las Vegas, NV destined to Fargo, ND. The second suspicious package was identified through USPS business records which showed both packages were tracked by the same Internet Protocol (IP) address on February 13<sup>th</sup>, 2025 approximately one (1) minute apart.
7. The second suspicious package was sent from Las Vegas, NV (89108) and destined to 1002 5<sup>th</sup> St N Apt 3 Fargo, ND 58102. On February 12<sup>th</sup>, 2025, the package was placed into the mail stream and was bearing tracking number EJ 957 129 392 U S, weighs 2 pounds 2 ounces and has \$67.15 in US Postage affixed. The package had an original scheduled delivery date of February 14<sup>th</sup>, 2025.

8. USPS business records show that both of the above listed suspicious USPS Priority Express packages (tracking ending in 89US and 92US) were placed into the mail stream approximately fifty minutes (50) apart at two separate Post Office locations in Las Vegas, NV.
9. On February 16<sup>th</sup>, 2025, the suspicious Priority Express package ending in tracking number (92US) arrived at the West Fargo Auxiliary Sorting Facility (ASF) to be sorted and processed. On February 17<sup>th</sup>, 2025, Inspection Service personnel went to the West Fargo ASF and visually and physically inspected the suspicious Priority Mail package and confirmed the below description and characteristics. The Package is from “Milly Davies 9086 S Hunting Arrow St. Las Vegas, NV 89123” and is addressed to “Phillip Davies 1002 5<sup>th</sup> St N Apt #3 Fargo, ND 58102”
10. Through review of various USPS records and other law enforcement databases, I learned the suspicious Priority Mail package contained several features, that in combination, are consistent with packages containing controlled substances, instrumentalities, or proceeds, sent using the US Mail
  - The Priority Mail Express package was mailed from Nevada which is a known controlled substance source state.
  - Individuals involved in distributing controlled substances or proceeds through the U.S. Mail may attempt to disguise the sender or recipient of the package by listing fictitious address information, using fictitious or generic/common names, or by using incomplete addresses. Your Affiant reviewed CLEAR law enforcement database for the package sender and found the listed sender name doesn't associate with the listed sender address. Your Affiant checked CLEAR law enforcement databases for the listed receiver on the package and found the listed receiver name to be associated with the address.
11. Postal regulation section 274.31 of the USPS Administrative Support Manual states that no one may detain mail sealed against inspection, except under the following condition: A Postal Inspector acting diligently and without avoidable delay, upon reasonable

suspicious, for a brief period of time, to assemble evidence sufficient to satisfy the probable cause requirement for a search warrant issued by a Federal Court.

12. On February 17<sup>th</sup>, 2025, the above-mentioned suspicious Priority Mail Express package was presented to a K-9 sniff at the Downtown Fargo Post Office. Fargo Police K-9 Detective Bret Witte and his certified narcotics detection dog "Kilo" examined the area where several packages were placed. The suspicious Priority Mail Express package was placed among five other packages of various sizes. Detective Witte indicated "Kilo" positively alerted to the presence of the odor of controlled substances emanating from suspicious Priority Mail Express package.
13. Attached hereto, and incorporated herein by reference as Attachment A, is information provided by the canine handler regarding the canine's training and accuracy in detecting controlled substances.
14. Your affiant, therefore, seeks the issuance of a warrant to search this package and the contents contained therein, for controlled substances, controlled substance paraphernalia, and the proceeds relating to the sale of controlled substances, in violation of Title 21, United States Code, Sections 841 (a)(1), 843(b), and 846.

Respectfully submitted,



Geoffrey Bakken

U.S. Postal Inspector TFO



SWORN AND SUBSCRIBED TO BEFORE ME

THIS 18<sup>th</sup>, day of February 2025.

UNITED STATES MAGISTRATE JUDGE